

SKANGA ENERGY & MARINE LIMITED,

Plaintiff,

v.

AREVENCA S.A., PETRÓLEOS DE
VENEZUELA S.A., and JAVIER GONZALEZ
ALVAREZ

Defendants.

Case 1:11-cv-04296-DLC-DLF

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, Affidavit of Lawrence H. Martin and exhibits attached thereto, Declaration of Elisaúl Miquelena, Declaration of Humberto Ferrín Cortes, Declaration of Luis Alberto Garcia Montoya, and Declaration of Uzoma Henry Azikiwe, Esq., Defendant Petróleos de Venezuela, S.A. (“PDVSA”) will move this Court, before the Hon. Denise L. Cote, United States District Judge, for an order dismissing the Second Amended Complaint pursuant to Federal Rule of Civil Procedure 12(b)(1) for lack of jurisdiction over the subject matter and Federal Rule of Civil Procedure 12(b)(2) for lack of jurisdiction over the person, and for such other and further relief as the Court deems appropriate.

Dated: April 17, 2014

Respectfully submitted,

FOLEY HOAG LLP

By: /s/ Lawrence H. Martin

Lawrence H. Martin
Ronald E. M. Goodman
Vivek Krishnamurthy
1717 K St NW
Washington, DC 20006
Telephone: 202-223-1200
Facsimile: 202-467-9672
Email: lhmartin@foleyhoag.com

Marjorie E. Berman
KRANTZ & BERMAN LLP
747 Third Avenue, 32nd Floor
New York, NY 10017
Telephone: 212-661-0009
Facsimile: 212-355-5009
E-Mail:
mberman@krantzberman.com

Attorneys for Defendant Petróleos de Venezuela S.A.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing NOTICE OF MOTION TO DISMISS THE SECOND AMENDED COMPLAINT was served electronically by the Court's ECF system, and by first class mail on those parties not registered for ECF pursuant to the rules of this court.

Dated: April 17, 2014

/s/ Lawrence H. Martin
Lawrence H. Martin